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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Chapter 13
Case No. 15-53504-SLJ

TINA MARIE JIMENEZ

MOTION TO MODIFY CHAPTER 13 PLAN

Debtor _____/

The Debtor respectfully requests that the Court modify the Chapter 13 plan as follows:

- X 1. With respect to the monthly plan payments of \$805, those payments shall:
X be suspended for the months of 4/18 and 5/18.
X be increased to \$836, effective 6/18.
_____ be decreased to _____, effective _____.
X be suspended for previously informally suspended payments totalling \$2415.

- _____ 2. With regard to secured claims:
_____ to treat the claim(s) of additional creditors as secured, as follows:

_____ to change the treatment of certain secured claims, as follows:

_____ to treat as unsecured, the claims of the following creditors which were previously treated as secured.

- _____ 3. With regard to general unsecured claims, to change the dividend paid:
_____ from _____ % to _____ %
_____ from a pot plan* of \$ _____ to a pot plan* of \$ _____
_____ from a percentage plan at _____ % to a pot plan* of \$ _____
_____ from a pot plan* of \$ _____ to a percentage plan at _____ %

* A pot plan provides for a sum (as specified above) to be distributed pro rata, in amounts determined after allowed administrative, secured and priority unsecured claims are paid. The plan payments will continue at the highest monthly payment provided in the confirmed plan, as it may have been modified, as necessary to pay all allowed administrative, secured and priority unsecured claims within sixty (60) months of the original date of confirmation.

Other modifications:

- _____ 4.
_____ 5. Debtor's reason(s) for requesting the above modification are:
Debtor has been out of work due to surgery since 4/18.

6. The plan, if modified, would be completed within sixty (60) months from commencement of the case.

WHEREFORE, the Debtor requests that the Court modify the Chapter 13 plan as set forth above.

Dated: 5/14/18


Attorney for Debtor, James S.K. Shulman